

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LEANNE TAN, Individually and  
On Behalf of All Others  
Similarly Situated,

Movant,

v.

JEREMY SISTRUNK

Respondent.

CIVIL ACTION NO. \_\_\_\_\_

**MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

LeAnne Tan, Movant, seeks to file an exhibit to her brief in support of her Motion to Compel under seal. This exhibit is a nondisclosure agreement that is subject to a protective order in the underlying litigation.

January 5, 2023

Respectfully submitted,

/s/ A. Cyclone Covey  
A. Cyclone Covey  
GA Bar No. 190747  
Kneupper & Covey, PC  
4475 Peachtree Lakes Dr.  
Berkeley Lake GA 30096  
[cyclone@kneuppercovey.com](mailto:cyclone@kneuppercovey.com)  
678-928-6806

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LEANNE TAN, Individually and  
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**MOVANT LEANNE TAN’S BRIEF IN SUPPORT OF HER MOTION FOR  
LEAVE TO FILE DOCUMENTS UNDER SEAL**

Movant LeAnne Tan is filing a Motion to Compel compliance with a subpoena and a supporting brief. Ms. Tan’s brief supporting her Motion to Compel references a nondisclosure agreement produced in discovery in the underlying litigation in the Southern District of California (the “Underlying Litigation”). That nondisclosure agreement has been designated confidential and is subject to a protective order in the Underlying Litigation.<sup>1</sup> To ensure compliance with the

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<sup>1</sup> *Tan v. Quick Box, LLC et al.*, No. 3:20cv1082, U.S. Dist. Ct. S. Dist. Cal., Dkt. 186 (Aug. 11, 2021) (protective order).

protective order in the Underlying Litigation Ms. Tan requests that she be granted leave to file the nondisclosure agreement under seal.

**CERTIFICATION OF COMPLIANCE**

I certify that this brief complies with Local Rule 5.1 as it is printed in Times New Roman 14 point font and meets the Court's margin requirements.

January 5, 2023

Respectfully submitted,

/s/ A. Cyclone Covey  
A. Cyclone Covey  
GA Bar No. 190747  
Kneupper & Covey, PC  
4475 Peachtree Lakes Dr.  
Berkeley Lake GA 30096  
[cyclone@kneuppercovey.com](mailto:cyclone@kneuppercovey.com)  
678-928-6806

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system on this 5<sup>th</sup> day of January, 2023. I also certify that the foregoing document, MOVANT LEANNE TAN’S BRIEF IN SUPPORT OF HER MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL, is being served this day on all counsel of record identified on the Service List below in the matter specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive Notices of Electronic Filing electronically.

/s/ Cyclone Covey

GORDON REES SCULLY  
MANSUKHANI, LLP  
Kimberly D. Howatt, Esq  
Damon W.D. Wright, Esq. (pro hac vice)  
101 West Broadway, Suite 2000  
San Diego, CA 92101  
[khowatt@grsm.com](mailto:khowatt@grsm.com);  
[dwright@grsm.com](mailto:dwright@grsm.com); [savants@grsm.com](mailto:savants@grsm.com)

*Attorneys for “Quick Box”  
Defendants*

[SERVED VIA EMAIL]

GORDON REES SCULLY  
MANSUKHANI, LLP  
Ryan M. Poteet, Esq.  
1101 King St., Suite 520  
Alexandria, VA 22314  
[rpoteet@grsm.com](mailto:rpoteet@grsm.com)

*Attorneys for “Quick Box”  
Defendants*

[SERVED VIA EMAIL]

GORDON REES SCULLY  
MANSUKHANI, LLP  
Christopher B. Queally, Esq.  
Tatiana Dupuy, Esq.  
5 Park Plaza, Suite 1100  
Irvine, CA 92614

[cqueally@grsm.com](mailto:cqueally@grsm.com); [tdupuy@grsm.com](mailto:tdupuy@grsm.com); [savants@grsm.com](mailto:savants@grsm.com) [SERVED VIA EMAIL]

*Attorneys for “Konnektive”  
Defendants*

Kiet Liu  
2000 S. Yale Street, Ste. G  
Santa Ana, CA 92704  
[kiet@rocketmgmtgroup.com](mailto:kiet@rocketmgmtgroup.com);  
[tanlitigation@gmail.com](mailto:tanlitigation@gmail.com)

*Pro se, Third Party Defendant*

[SERVED VIA EMAIL]

Rocket Management Group, LLC  
c/o Registered Agent  
2000 S Yales Street, Ste. G  
Santa Ana, CA 92704  
[tanlitigation@gmail.com](mailto:tanlitigation@gmail.com)

*Pro se, Third Party Defendant*

[SERVED VIA EMAIL]